United States Property and Fiscal

Office for Utah

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VISA I.M.P.A.C. Credit Card Program Brief

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GSA VISA I.M.P.A.C. Credit Card Program Overview

- Background and History
- GSA Program Statistics
- Utah National Guard Statistics
- Basic Guidance

What is VISA I.M.P.A.C.?

International

Merchant

Purchase = **I.M.P.A.C.**

Authorization

Card

A Government-Wide Commercial Credit Card Program

What is the VISA I.M.P.A.C. Government-Wide Credit Card Program?

A Commercial Credit Card Program designed to Streamline Procurement, Payment Procedures and Reduce the Administrative Burden (Cost, Paperwork, and Leadtime) for Acquiring Supplies and Services *At or Below* the Micro-Purchase Threshold ($2,500.00).

Source: GSA/FAR

GSA VISA I.M.P.A.C. Credit Card Program
Background and History

- Credit Card Program “Piloted” in 1986 with Department of Commerce

- GSA Awarded Competitive Contract for Commercial Credit Card Services in Apr 1989, Mar 1994 and Feb 1998 (Task Order Awarded U.S. Bank Jun 1998, Effective Dec 1998)

- Program Gained Recognition Under Vice President Gore’s 1993 National Performance Review (NPR) Re-Invention Lab
  - “Lower Costs and Reduce Bureaucracy in Small Purchases Through The Use Of Purchase Cards”

GSA VISA I.M.P.A.C. Credit Card Program
Background and History

- NPR Procurement Reform Initiative “Proc 09” Directed All Federal Agencies to Make Small Purchases Through The I.M.P.A.C. Program

- Executive Order 12931 Directed Heads of Agencies “To Expand Use of Government Purchase Cards...To the Maximum Extent Practicable...”

- 1994 Federal Acquisition Streamlining Act (FASA, P. L.103-355, Section 4301) Defined, Established and Implemented Micro-Purchase Authority and Procedures

GSA VISA I.M.P.A.C. Credit Card Program
Background and History

- FASA Micro-Purchase Legislation Authority Accomplished the Following:
  - Established Micro-Purchase Threshold at $2,500.00
  - Exempted Micro-Purchases from the Small Business Act and Buy American Act
  - Allowed Micro-Purchases to be Made Without Obtaining Competitive Quotes **Provided** Price Is Fair and Reasonable

GSA VISA I.M.P.A.C. Credit Card Program
Background and History

- FASA Micro-Purchase Legislation Authority Accomplished the Following: (Continued)
  - Directed Micro-Purchases Be Distributed **Equitably** Among Qualified Suppliers
  - Directed Micro-Purchase Authority and Procedures Be Implemented Through The Federal Acquisition Regulation (FAR)
  - Federal Acquisition Circular (FAC) 90-24 Issued Dec 94 Implemented Micro-Purchase Authority and Procedures

GSA VISA I.M.P.A.C. Credit Card Program
Background and History

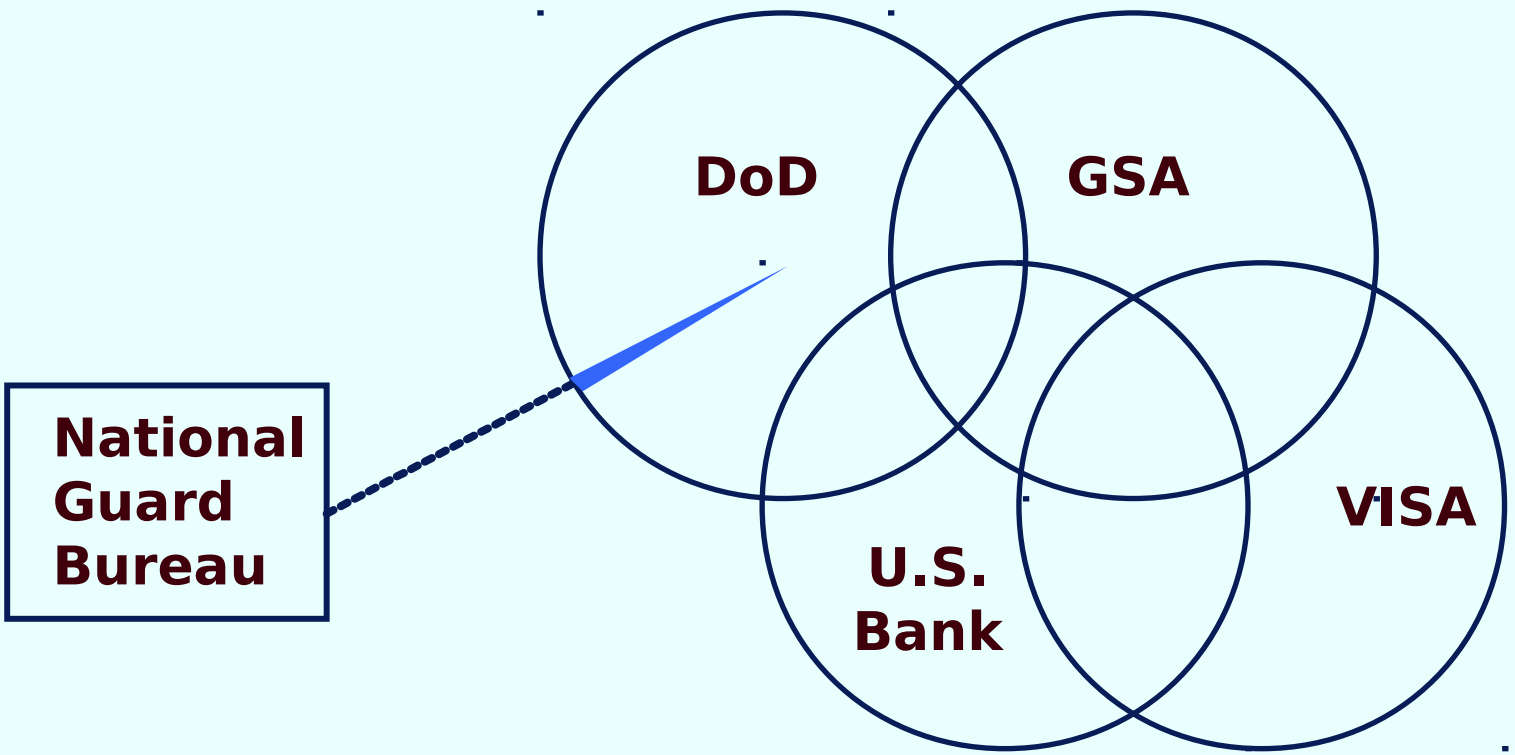
- FASA Micro-Purchase Legislation Authority Accomplished the Following: (Continued)
  - Significant Legislation
  - 255 LAWS repealed or modified
  - Enacted October 13, 1994
  - Less than $2,500 is a micro-purchase
  - Expanded and promoted use of VISA credit card

GSA VISA I.M.P.A.C. Credit Card Program
Background and History

- BENEFITS
  - Fast response to purchasing requirements
  - Vendor is paid within 72 hours
  - One check to the bank

GSA VISA I.M.P.A.C. Credit Card Program

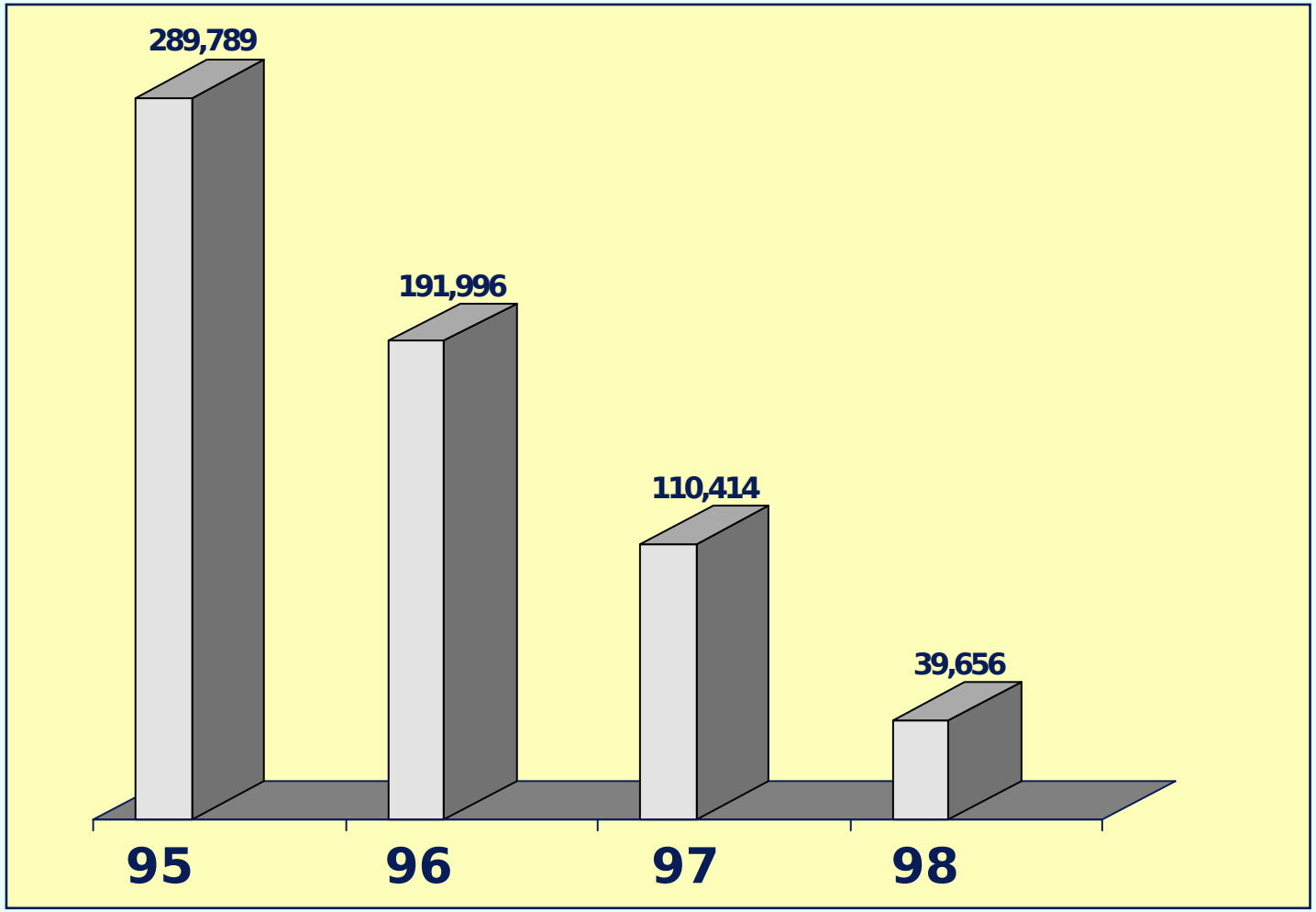
Program Players



General **S**ervices **A**dministration
Department **o**f **D**efense
U.S. Bank

VISA I.M.P.A.C. Credit Card Program
National Guard Statistics

ARNG and ANG Purchase Orders (< $2,500) by Fiscal Ye



VISA I.M.P.A.C. Credit Card Program
Utah National Guard Statistics

FY00 UTARNG Results

Credit Cards Issued	171
Credit Card Transactions	8,244
Purchases	$2,216,990
Average Card Purchase	$269

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance

- Ensure Level Account Number Is Correct

  ARNG: 47163 00021 00018 XXXXX

- Ensure Unit is Properly Identified - Name, Address and Organizational Program Manager (OPM)

  ARNG: USPFO for Utah

GSA VISA I.M.P.A.C. Credit Card Program Basic Guidance

- VISA I.M.P.A.C. Card Used as a "**Credit Card Purchase**" at $2,500.00 and Below

  - No Formal Procurement Paperwork Required
  - Cardholder Records Minimum Information on Credit Card Register
  - Purchases ***Are Not*** Counted ***or*** Reported on DD Form 1057
  - U.S. Bank Captures and Reports Credit Card Transactions to GSA Monthly

GSA VISA I.M.P.A.C. Credit Card Program Basic Guidance

- VISA I.M.P.A.C. Card Can Be Used as a "**Method Of Payment**" on Formal Purchases $2,500.00 and Above (FAR Subpart 13.301)

  - Credit Card is Used in Conjunction with Formal Procurement Purchase (P.O., BPA, Delivery Order, Contract, Etc.) as a Method Of Payment
  - Purchase is Accomplished Using Normal Procurement Procedures (Formal Procurement Paperwork, Small Business Set-Aside, Competition)
  - Contractor / Vendor Has to Agree to Accept Payment by Credit Card
  - Procurement Action ***is*** Counted on DD Form 1057

GSA VISA I.M.P.A.C. Credit Card Program Basic Guidance

Split Credit Card Purchases

- FAR Subpart 13.003 (c) Prohibits Breaking Down "Aggregated" Requirements into Several Purchases to Avoid Formal Procurement Purchasing Rules
- Assistant Secretary of the Army, Research, Development and Acquisition (ASARDA) Issued Memorandum Clarifying Guidance on Split Card Purchases 3 Oct 1997
  - Defined "Improper Split"
  - Defined Purchase Card Requirement as What the Known Full Requirement is at the Time of Making Card Purchase

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance
Split Credit Card Purchases (Continued)

- "Improper Split" is the Willful Reduction of a Known Requirement in Order to be Able to Make a Purchase at or Below the Cardholder's Single Purchase Limit (SPL)
- Organizational Program Manager/Coordinator (OPM/OPC) Shall Address Abuses with "Decisive Action"
  - Retraining
  - Card Suspension and/or
  - Card Holder/Billing Official Account Cancellation

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance
I.M.P.A.C. Convenience Check

- Authorized Per Office Under Secretary of Defense, Comptroller (OUSD(C)); Purchase Card Reengineering Implementation Memorandum #5: Accommodation Checks, Dated 5 Aug 1997
- Deputy Assistant Secretary of the Army, Financial Operations (DASA(FO)) Issued Policy Implementation Guidance 4 Feb 1998
- National Guard Bureau Acquisition Policy Directorate (NGB-AQP) “Informally” Disseminated Accommodation Check Information to Field Contracting Offices
  - Formal Contract Policy Letter (CPL) to be Drafted Authorizing Accommodation Check

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance
I.M.P.A.C. Convenience Check (NGB-AQP Policy)

- Accommodation Check Limited to Two Accounts, Primary and Alternate
- Accounts Established by Contracting Officer
- Accounts Limited to $2,500.00
- Check Issued as a “Last Resort”; No Other Vendor, Emergency/Unique Situation
  - Customer Requesting Check Issuance Must Coordinate with Alice Krelo

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance

Issuing VISA I.M.P.A.C. Credit Cards to State Employees

- NGB-AQP Policy is VISA I.M.P.A.C. Credit Cards Shall Not be Issued to State Employees
- Assistant Counsel, Contract Fiscal Law (NGB-JA) Issued Legal Opinion Memorandum 13 Jun 1997 on Matter at Acquisition Policy Division's Request
  - No Authority or Basis in Law; Two Separate Entities (Federal Government vs. State Government)
  - State Employee of one Entity (State Government) Cannot Contractually Commit, Obligate and Directly Spend Federal Dollars for Federal Entity (Federal Government)
  - Only Title 5, Title 10 and Title 32 U.S. Code Personnel (Federal Technician) Can Use I.M.P.A.C. Credit Card

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance
DD Form 1556 Training

- Deputy Secretary of Defense (DSD) Directed Purchase Card be Used as the Method of Payment for All Training Requests Using a DD Form 1556 Valued at or Below $25,000 (Ref. Purchase Card Program Reengineering Memorandum #6 Dated 20 Jul 1998)
  - Directed Under Secretary of Defense, Personnel and Readiness (USD (P&R)) To Issue Department-Wide Policy Directing All Defense Departments Expedite Purchase Card as Method of Payment
- USD (P&R) Issued Memorandum 30 Sep 1998 Directing All Defense Departments Use Purchase Card as Method of Payment for All Commercial Training Requests Using DD Form 1556 at or Below $25,000 (Ref. USD (P&R) Memorandum Entitled “Use of Government-Wide Purchase Cards”)

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance
DD Form 1556 Training (Continued)

- National Guard Bureau Human Resource Directorate (NGB-HR) Issued Change to Technician Personnel Regulation (TPR) 400
  - Employee Development Specialist (EDS), State Human Resource Office (HRO), Shall Obtain and Use Purchase Card to Pay for All DD Form 1556 Training at or Below $25,000 (Ref. TPB 2-98-400 Dated 1 Oct 1998)
- NGB-AQP Issued Guidance 25 Nov 1998 and 4 Feb 1999 to ARNG P&C Offices and ANG BCO Offices via E-Mail; Re: Using the VISA I.M.P.A.C. Credit Card to Pay for Training
  - A Valid and Approved DD Form 1556 Required

GSA VISA I.M.P.A.C. Credit Card Program Basic Guidance

DD Form 1556 Training (Continued)

- EDS (HR Training Representative) Shall Use VISA I.M.P.A.C. Credit Card to Pay for Training.
- Block 27 of DD Form 1556 Should State, “Payment Will Be Made By VISA I.M.P.A.C. Credit Card, not to Exceed $25,000. POC to Request Payment is _____.”
  - Reverse Side of Copy Number 4, “Vendor (Finance),” of DD Form 1556 Provides Block for Additional Detailed Billing Instructions

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance
Hazardous Material

- Customer Should First Check With The Environmental Office and Obtain Approval
  - If Item on FEDSTD No. 313 and MSDS Sheet Required, Purchase with SF 1449 and Attach Hazardous Material Clause
  - OPM/OPC Shall Address Hazardous Material Purchases in Local SOP and During Cardholder Training
  - General Rule: If Customer in Doubt About Purchasing, He/She Should Check With Contracting Office for Guidance

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance
Contingency Contracting

- Contingency Operation Defined As:
  - A Secretary of Defense Designated Operation Whereby Armed Forces Are or May Become Involved in Military Action/Hostilities/Operations Against an Enemy or Opposing Military force or,
  - A Call or Orders to, or Retention on, Active Duty of Members of the Uniformed Services During a War or During a National Emergency Declared by the President or Congress (10 U.S.C. 101(a)(13))
- Applies to “Humanitarian or Peacekeeping Operation”; a Military Operation in Support of Humanitarian or Foreign Disaster Assistance or, in Support of a Peacekeeping Operation Under Chapter VI or VII of the United Nations Charter (10 U.S.C. 2302(8))

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance
Contingency Contracting (Continued)

- Simplified Acquisition Threshold is $200,000 for a Declared Contingency Operation or Humanitarian/Peacekeeping Operation Outside the United States (FAR Subpart 2.101)
- Mobilized (Federal Status) National Guard Personnel Attach to Gaining Active Duty Military Command and/or Contracting Theater Command
- Gaining Military Command Responsible for Providing Deployment Instructions and Guidance, to Include Contracting Requirements
  - Contracting Authority/Warrant (Yes, No)
  - Credit Card (Yes, No)
  - Funds

GSA VISA I.M.P.A.C. Credit Card Program
Basic Guidance
Contingency Contracting (Continued)

- Mobilized National Guard Contracting Personnel Shall Clarify/Coordinate Contracting Requirements with Gaining Military Command **Before** Deploying
  - Contracting Authority/Warrant
  - Bring Credit Card/Don't Bring Credit Card
  - Appropriately Fund Credit Card if Directed to Bring